

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

**BLUE CROSS BLUE SHIELD
ASSOCIATION, *et al.***

CIVIL ACTION No. 2:13-cv-4663-JS

Plaintiffs,

v.

GLAXOSMITHKLINE LLC,

Defendant.

PROPOSED ORDER

AND NOW, this _____ day of November, 2018, upon consideration of Defendant GlaxoSmithKline LLC's Unopposed Motion for Leave to File "Confidential" and "Highly Confidential" Materials Under Seal, it is hereby ORDERED that the Motion is GRANTED. GSK shall file the following under seal:

- a. GSK's Memorandum of Law in Support of its Motion for Summary Judgment;
- b. GSK's Statement of Undisputed Material Facts in Support of its Motion for Summary Judgment;
- c. Appendix to GSK's Motion for Summary Judgment and Statement of Undisputed Material Facts;
- d. GSK's Memorandum of Law in Support of Motion to Exclude the Expert Testimony of Philip Russ, Drs. Davis Kessler, Matthew Perri, Stephen Schondelmeyer, and Rena Conti, including attached exhibits.

Pursuant to the Court's Order of November 5, 2018 (Doc. No. 199), GSK shall file via ECF redacted versions of the foregoing materials within 10 business days.

SO ORDERED:

Sánchez, C.J.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

BLUE CROSS BLUE SHIELD
ASSOCIATION, *et al.*

CIVIL ACTION No. 2:13-cv-4663-JS

Plaintiffs,

v.

GLAXOSMITHKLINE LLC,

Defendant.

**DEFENDANT GLAXOSMITHKLINE LLC'S UNOPPOSED
MOTION FOR LEAVE TO FILE "CONFIDENTIAL" AND
"HIGHLY CONFIDENTIAL" MATERIALS UNDER SEAL**

Defendant GlaxoSmithKline LLC ("GSK"), by and through its undersigned counsel, respectfully seeks leave to file under seal materials containing or referencing "Confidential" and "Highly Confidential" information. In support of this Motion, GSK avers as follows:

1. On February 15, 2017, this Court entered a Protective Order in the above-captioned matter (the "Protective Order") to protect and maintain the confidentiality of Discovery Materials designated by the parties as "Confidential" or "Highly Confidential." See Doc. No. 117.

2. The Protective Order provides that, if "a party desires to file Confidential or Highly Confidential Material under seal, it shall file by ECF...a motion for leave to file under seal without making reference to the substance of the Confidential or Highly Confidential Materials. Protective Order, ¶ 13(a).

3. GSK respectfully seeks leave to file the following materials under seal, each of which contains and/or references material designated "Confidential" or "Highly Confidential":

a. GSK's Memorandum of Law in Support of its Motion for Summary Judgment;

- b. GSK's Statement of Undisputed Material Facts in Support of its Motion for Summary Judgment;
- c. Appendix to GSK's Motion for Summary Judgment and Statement of Undisputed Material Facts;
- d. GSK's Memorandum of Law in Support of Motion to Exclude the Expert Testimony of Philip Russ, Drs. Davis Kessler, Matthew Perri, Stephen Schondelmeyer, and Rena Conti, including attached exhibits.

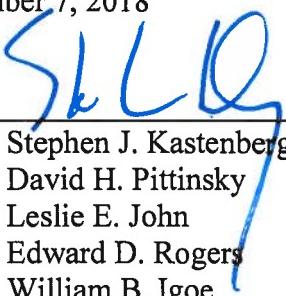
4. If the Court grants GSK's Motion for Leave, GSK will file via ECF redacted versions of the foregoing materials within 10 business days pursuant to the Court's Order dated November 5, 2018. *See* Doc. No. 199.

5. Plaintiffs do not oppose this Motion.

WHEREFORE, GSK respectfully requests that the Court grant the Motion and enter and Order permitting GSK to file under seal the materials identified in Paragraph 3.

November 7, 2018

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that, on this date, he caused to be served copies of the foregoing upon counsel of record by ECF.

November 7, 2018

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